

**NEW SOURCE CONSTRUCTION PERMIT
and MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY**

**Rhinehart Finishing, LLC
5345 County Road 68
Spencerville, Indiana 46788**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 033-14280-00078	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 23, 2001 Expiration Date: July 23, 2006

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates custom coating and finishing plant.

Authorized Individual: Don McDaniel
Source Address: 5345 County Road 68, Spencerville, Indiana 46788
Mailing Address: 5345 County Road 68, Spencerville, Indiana 46788
Phone Number: (219) 925-2580
SIC Code: 3479
County Location: Dekalb
County Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

- (a) Surface coating operations consisting of one (1) paint mix room and four (4) spray paint booths (identified as PB-1, PB-2, PB-3 and PB-4). Each spray paint booth is equipped with two (2) high volume low pressure (HVLP) spray guns used for painting steel, aluminum and plastic parts. The maximum capacity of each spray booth is 425 square feet of coating per hour. Emissions of particulate matter from the spray booths are controlled using dry filters, exhausting at stacks S-19, S-20, S-21, and S-22.
- (b) One (1) six-stage metal parts aqueous washing and zinc phosphating line, using only water, soap and zinc phosphate solutions, and containing the following natural gas-fired heating units:
 - (1) Washer-line drying oven (identified as C.U. 001) having a maximum heat input capacity of 2.5 MMBtu per hour and exhausting at stack S-8.
 - (2) Washer-line stage 1 burner (identified as C.U. 002) having a maximum heat input capacity of 3.5 MMBtu per hour and exhausting at stack S-3.
 - (3) Washer-line stage 4 burner (identified as C.U. 003) having a maximum heat input capacity of 2.0 MMBtu per hour and exhausting at stack S-4.
- (c) Two (2) powder coating booths (identified as PC-1 and PC-2) each with a maximum capacity of 50 pounds of powder coating per hour. Powders are recycled using a cyclone and baghouse, which are considered to be integral to the process.
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, including:
 - (1) Powder coat cure oven (identified as C.U. 004) having a maximum heat input capacity of 3.5 MMBtu per hour and exhausting at stack S-10.

- (2) Liquid spray paint cure oven (identified as C.U. 005) having a maximum heat input capacity of 1.5 MMBtu per hour and exhausting at stack S-18.
- (3) Pyrolysis cleaning furnace having a maximum heat input capacity of 0.75 MMBtu per hour and a maximum processing capacity of ten (10) pounds hydrocarbon coatings per hour. Emissions are controlled using an afterburner, which exhausts at stack S-28.
- (4) North general building heater(identified as C.U. 006) having a maximum heat input capacity of 0.3 MMBtu per hour and exhausting at stack S-11.
- (5) Southeast general building heater (identified as C.U. 007) having a maximum heat input capacity of 0.3 MMBtu per hour and exhausting at stack S-12.
- (6) South general building heater (identified as C.U. 008) having a maximum heat input capacity of 0.3 MMBtu per hour and exhausting at stack S-13.
- (7) Wet paint room air makeup unit (identified as C.U. 009) having a maximum heat input capacity of 1.1 MMBtu per hour.
- (8) Powder Paint Room air makeup unit (identified as C.U. 010) having a maximum heat input capacity of 1.1 MMBtu per hour.
- (9) Warehouse area air makeup unit (identified as C.U. 011) having a maximum heat input capacity of 2.073 MMBtu per hour.
- (10) Environmental room air conditioner and heater No.1 (identified as C.U. 012) having a maximum heat input capacity of 0.15 MMBtu per hour.
- (11) Environmental room air conditioner and heater No. 2 (identified as C.U. 013) having a maximum heat input capacity of 0.15 MMBtu per hour.

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.
 - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.

- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).
- (e) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

B.7 Permit Term [326 IAC 2-6.1-7]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications or amendments of this permit do not affect the expiration

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of all criteria pollutants is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ prior to making the change.
- (c) Any change or modification which may increase potential to emit to 10 tons per year of any single hazardous air pollutant, twenty-five tons per year of any combination of hazardous air pollutants, or 100 tons per year of any other regulated pollutant from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the “authorized individual” as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

Testing Requirements

C.8 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.9 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.10 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.11 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.

- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

Record Keeping and Reporting Requirements

C.17 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality(OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.18 Monitoring Data Availability [326 IAC 2-6.1-2][IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.20 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope

or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (c) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.21 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

SECTION D.1 FACILITY CONDITIONS

Facility Description:

- (a) Surface coating operations consisting of one (1) paint mix room and four (4) spray paint booths (identified as PB-1, PB-2, PB-3 and PB-4). Each spray paint booth is equipped with two (2) high volume low pressure (HVLP) spray guns used for painting steel, aluminum and plastic parts. The maximum capacity of each spray booth is 425 square feet of coating per hour. Emissions of particulate matter from the spray booths are controlled using dry filters, exhausting at stacks S-19, S-20, S-21, and S-22.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied to metal components in the Spray Booths (PB-1, PB-2, PB-3 and PB-4) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calendar day, for extreme performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the spray paint booths (PB-1, PB-2, PB-3, and PB-4) shall not exceed allowable PM emission rate based on the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-4-1]

The spray paint booths (PB-1, PB-2, PB-3 and PB-4) has uncontrolled potential to emit for hazardous air pollutants (HAPs) that is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of any combination of HAPs. Therefore, 326 IAC 2-4-1 does not apply. The Permittee shall obtain approval from IDEM, OAQ prior to making any modifications to the plant that would increase the potential to emit of any single HAP above the ten (10) tons per year threshold or any combination of HAPs above the twenty-five (25) tons per year threshold.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control device.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds

Compliance with the VOC content limitation contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer.

However, IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.7 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the four (4) paint booths (PB-1, PB-2, PB-3, and PB-4) are in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S-19, S-20, S-21, and S-22) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.1.1 and the HAP usage limit established in Condition D.1.3.
 - (1) The VOC and HAP content of each coating material used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type of coating used; and
 - (2) A log of the dates of use.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description:

- (b) Two (2) powder coating booths (identified as PC-1 and PC-2) each with a maximum capacity of 50 pounds of powder coating per hour. Powder coatings are collected using a cyclone and baghouse which are considered to be integral to the process.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the powder coating booths (PC-1 and PC-2) shall be limited by the following:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description:

- (d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, including:
 - (1) Pyrolysis cleaning furnace having a maximum heat input capacity of 0.75 MMBtu per hour and a maximum processing capacity of ten (10) pounds hydrocarbon coatings per hour. Emissions are controlled using an afterburner, which exhausts at stack S-28.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.3.1 Incinerator Requirements [326 IAC 4-2]

Pursuant to 326 IAC 4-2, the pyrolysis cleaning furnace shall:

- (a) Consist of primary and secondary chambers or the equivalent;
- (b) Be equipped with a primary burner unless burning wood products;
- (c) Comply with 326 IAC 5-1 and 326 IAC 2;
- (d) Be maintained properly as specified by the manufacturer and approved by the commissioner;
- (e) Be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;
- (f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;
- (g) Be operated so that emissions of hazardous material including but not limited to viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;
- (h) Not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard condition corrected to fifty percent (50%) excess air; and
- (i) Not create a nuisance or fire hazard.

If any of the above result, the burning shall be terminated immediately.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Rhinehart Finishing, LLC
Address:	5345 County Road 68
City:	Spencerville, Indiana 46788
Phone #:	(219) 925-2580
MSOP #:	033-14280-0078

I hereby certify that Rhinehart Finishing, Inc. is ☒ still in operation.
☐ no longer in operation.

I hereby certify that Rhinehart Finishing, Inc. is ☒ in compliance with the requirements of MSOP 033-14280-00078.

☐ not in compliance with the requirements of MSOP 033-14280-00078.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?____, 25 TONS/YEAR SULFUR DIOXIDE ?____, 25 TONS/YEAR NITROGEN OXIDES?____, 25 TONS/YEAR VOC ?____, 25 TONS/YEAR HYDROGEN SULFIDE ?____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?____, 25 TONS/YEAR FLUORIDES ?____, 100TONS/YEAR CARBON MONOXIDE ?____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO₂, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6 and to qualify for
the exemption under 326 IAC 1-6-4.**

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a New Source Construction and Minor Source Operating Permit

Source Background and Description

Source Name: Rhinehart Finishing, LLC
Source Location: 5345 County Road 68, Spencerville, Indiana 46788
County: Dekalb
SIC Code: 3479
Operation Permit No.: 033-14280-00078
Permit Reviewer: ERG/AB

The Office of Air Quality (OAQ) has reviewed an application from Rhinehart Finishing relating to the construction and operation of a custom coating and finishing plant.

New Emission Units and Pollution Control Equipment

The source consists of the following emission units and pollution control devices to be constructed:

- (a) Surface coating operations consisting of one (1) paint mix room and four (4) spray paint booths (identified as PB-1, PB-2, PB-3 and PB-4). Each spray paint booth is equipped with two (2) high volume low pressure (HVL) spray guns used for painting steel, aluminum and plastic parts. The maximum capacity of each spray booth is 425 square feet of coating per hour. Emissions of particulate matter from the spray booths are controlled using dry filters, exhausting at stacks S-19, S-20, S-21, and S-22.
- (b) One (1) six-stage metal parts aqueous washing and zinc phosphating line, using only water, soap and zinc phosphate solutions, and containing the following natural gas-fired heating units:
 - (1) Washer-line drying oven (identified as C.U. 001) having a maximum heat input capacity of 2.5 MMBtu per hour and exhausting at stack S-8.
 - (2) Washer-line stage 1 burner (identified as C.U. 002) having a maximum heat input capacity of 3.5 MMBtu per hour and exhausting at stack S-3.
 - (3) Washer-line stage 4 burner (identified as C.U. 003) having a maximum heat input capacity of 2.0 MMBtu per hour and exhausting at stack S-4.
- (c) Two (2) powder coating booths (identified as PC-1 and PC-2) each with a maximum capacity of 50 pounds of powder coating per hour. Powders are recycled using a cyclone and baghouse, which are considered to be integral to the process.
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, including:

- (1) Powder coat cure oven (identified as C.U. 004) having a maximum heat input capacity of 3.5 MMBtu per hour and exhausting at stack S-10.
- (2) Liquid spray paint cure oven (identified as C.U. 005) having a maximum heat input capacity of 1.5 MMBtu per hour and exhausting at stack S-18.
- (3) Pyrolysis cleaning furnace having a maximum heat input capacity of 0.75 MMBtu per hour and a maximum processing capacity of ten (10) pounds hydrocarbon coatings per hour. Emissions are controlled using an afterburner, which exhausts at stack S-28.
- (4) North general building heater (identified as C.U. 006) having a maximum heat input capacity of 0.3 MMBtu per hour and exhausting at stack S-11.
- (5) Southeast general building heater (identified as C.U. 007) having a maximum heat input capacity of 0.3 MMBtu per hour and exhausting at stack S-12.
- (6) South general building heater (identified as C.U. 008) having a maximum heat input capacity of 0.3 MMBtu per hour and exhausting at stack S-13.
- (7) Wet paint room air makeup unit (identified as C.U. 009) having a maximum heat input capacity of 1.1 MMBtu per hour.
- (8) Powder Paint Room air makeup unit (identified as C.U. 010) having a maximum heat input capacity of 1.1 MMBtu per hour.
- (9) Warehouse area air makeup unit (identified as C.U. 011) having a maximum heat input capacity of 2.073 MMBtu per hour.
- (10) Environmental room air conditioner and heater No.1 (identified as C.U. 012) having a maximum heat input capacity of 0.15 MMBtu per hour.
- (11) Environmental room air conditioner and heater No. 2 (identified as C.U. 013) having a maximum heat input capacity of 0.15 MMBtu per hour.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Existing Approvals

This permit is for the construction and operation of a new plant. There are no existing emission units located at this site and no previous air approvals issued to this source.

Air Pollution Control Justification as an Integral Part of the Process

The company has submitting the following justification such that the cyclone and baghouse be considered as an integral part of the powder coating process:

- (a) The Wagner Quick-Change Powder Booth system draws powder from the application equipment over the parts with excess powder collected in a powder recovery system that consists of a cyclone and baghouse. This system is designed to be operated with the cyclone and baghouse as an integral part of the process.
- (b) This powder coating system cannot be operated without the powder recovery system because the amount of powder lost during the process would make this coating method prohibitively expensive.

IDEM, OAQ has evaluated the justifications and agreed that the cyclone and baghouse will be considered as an integral part of the powder coating process. Therefore, the permitting level will be determined using the potential to emit after the cyclone and baghouse. Operating conditions in the proposed permit will specify that this cyclone and baghouse shall operate at all times when the powder coating booths (identified as PC-1 and PC-2) are in operation.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S-1	Washer Entrance	30	1.5	3,600	130
S-2	Washer Exit	30	1.5	3,600	130
S-4	Washer Stage 1 Burner	30	0.83	675	800
S-4	Washer Stage 4 Burner	30	0.67	415	800
S-5	Washer Dry-off Oven Entrance	30	1.7	Gravity	250
S-6	Washer Dry-off Oven Exit	30	1.7	Gravity	250
S-7	Washer Dry-off Oven Exhaust	30	1.2	1,520	250
S-8	Powder Coat Cure Oven Entrance	30	1.7	Gravity	400
S-9	Powder Coat Cure Oven Exit	30	1.7	Gravity	400
S-10	Powder Coat Cure Oven Exhaust	30	1.2	1,807	400
S-11	General Building Heater	30	0.5	--	Ambient
S-12	General Building Heater	30	0.5	--	Ambient
S-13	General Building Heater	30	0.5	--	Ambient
S-14	General Building Exhaust Fan	30	3.5 by 3.5	--	Ambient
S-15	General Building Exhaust Fan	30	3.5 by 3.5	--	Ambient
S-16	General Building Exhaust Fan	30	3.5 by 3.5	--	Ambient
S-17	General Building Exhaust Fan	30	3.5 by 3.5	--	Ambient
S-18	Liquid Spray Paint Line Cure Oven	30	0.83	2,334	400

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S-19	Spray Paint Booth No. 1 (PB-1)	30	2.0	8,000	Ambient
S-20	Spray Paint Booth No.2 (PB-2)	30	2.0	8,000	Ambient
S-21	Spray Paint Booth No.3 (PB-3)	30	2.0	8,000	Ambient
S-22	Spray Paint Booth No.4 (PB-4)	30	2.0	8,000	Ambient
S-23	Air Compressor Room	20	Wall Exhaust		Ambient
S-27	Paint Mix Room	30	0.5	635	Ambient
S-28	Pyrolysis Cleaning Furnace	17	0.83	1,000 to 1,400	1,400
S-29	Environmental Room Heating	30	0.5	30,000	450
S-30	Environmental Room Heating	30	0.5	30,000	450

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on April 16, 2001.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 25).

Potential To Emit of Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	32.76
PM-10	32.76
SO ₂	0.151
VOC	38.14
CO	6.59
NO _x	7.71

HAPs	Potential To Emit (tons/year)
Xylene	1.24
Toluene	3.16
Methyl Ethyl Ketone	2.87
Chromium Compounds	2.25
Hexamethylene Diisocyanate	0.12
Cobalt Compounds	1.57
TOTAL	11.21

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM, PM-10, and VOC are greater than 25 tons per year, therefore, the source is subject to the provisions of 326 IAC 2-6.1.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (d) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Dekalb County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Dekalb County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Dekalb County has been classified as attainment or unclassifiable for PM-10, SO₂, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) **Fugitive Emissions**
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate

matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	2.4
PM10	2.4
SO ₂	0.151
VOC	38.14
CO	6.59
NO _x	7.71
Single HAP	3.16
Combination HAPs	11.21

- (a) This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source. The New Source Performance Standard (NSPS) 40 CFR 60, Subpart E (Standards of Performance for Incinerators) is not applicable to the pyrolysis cleaning furnace because Subpart E applies only to incinerators that have a maximum charging rate equal to or greater than 50 tons per day.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

The aqueous washers are not subject to the requirements of 40 CFR 63, Subpart T - National Emission Standards for Halogenated Solvent Cleaning (326 IAC 14), because the source does not use halogenated solvents in their aqueous washers.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Dekalb County and the potential to emit criteria pollutants is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The aqueous washers are not subject to the requirements of 326 IAC 8-3 because the source does not use organic solvents in their aqueous washers.

State Rule Applicability - Liquid Paint Spray Booths

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of this new coating and finishing plant will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply. The Permittee shall obtain approval from IDEM, OAQ prior to making any modifications to the source that would increase the potential to emit any single HAP to greater than ten (10) tons per year or the potential to emit any combination of HAPs to greater than twenty-five (25) tons per year.

326 IAC 8-1-6 (New Facilities - General Reduction Requirement)

This source is not subject to the provisions of 326 IAC 8-1-6 (New Facilities - General Reduction Requirements), because 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) is applicable.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the spray paint booths shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters shall be in operation at all times the spray booths are in operation, in order to comply with this limit.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicators at spray booths 1, 2, 3, and 4 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for high performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

These emission units are subject to 326 IAC 8-2-9 because the potential to emit VOC is greater than 15 pounds per day.

Based on the MSDS submitted by the source and calculations made, the spray booths will be in compliance with this requirement.

State Rule Applicability - Powder Coating Booths

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the powder coating booths (PC-1 and PC-2) shall be limited by the following:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

326 IAC 8 (Volatile Organic Compounds)

Since no volatile organic compounds are used or produced during the powder coating operation, the powder coating booths are not subject to 326 IAC 8.

State Rule Applicability - Pyrolysis Cleaning Furnace

326 IAC 4-2 (Incinerators)

Pursuant to 326 IAC 4-2, the pyrolysis cleaning furnace shall:

- (a) Consist of primary and secondary chambers or the equivalent;
- (b) Be equipped with a primary burner unless burning wood products;
- (c) Comply with 326 IAC 5-1 and 326 IAC 2;
- (d) Be maintained properly as specified by the manufacturer and approved by the commissioner;
- (e) Be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;
- (f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;
- (g) Be operated so that emissions of hazardous material including but not limited to viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;
- (h) Not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard condition corrected to fifty percent (50%) excess air; and
- (i) Not create a nuisance or fire hazard.

If any of the above result, the burning shall be terminated immediately.

Note: The manufacturer's guaranteed particulate emission rate for the furnace is 0.25 pounds of particulate per 1,000 pounds of dry exhaust gas, corrected to 50% excess air.

Conclusion

The construction and operation of this custom coating and finishing plant shall be subject to the conditions of the attached proposed New Source Construction and Minor Source Operating Permit 033-14280-00078.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Washer Line Drying Oven (C.U. 001)

Company Name: Rhinehart Finishing, L.L.C.

Address City IN Zip: Spencerville, IN 46788

CP: 033-14280

Plt ID: 033-00078

Reviewer: ERG/AB

Date: 05/03/01

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.5

21.9

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.08	0.08	0.01	1.10	0.06	0.92

*PM emission factors are for filterable and condensable PM combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only**

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MM BTU/HR <100

Washer Line Drying Oven (C.U. 001)

HAPs Emissions

Company Name: Rhinehart Finishing, L.L.C.

Address City IN Zip: Spencerville, IN 46788

CP: 033-14280

Plt ID: 033-00078

Reviewer: ERG/AB

Date: 05/03/01

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.300E-05	1.314E-05	8.213E-04	1.971E-02	3.723E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	5.475E-06	1.205E-05	1.533E-05	4.161E-06	2.300E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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updated 4/99

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Washer Line Stage 1 Burner (C.U. 002)

Company Name: Rhinehart Finishing, L.L.C.

Address City IN Zip: Spencerville, IN 46788

CP: 033-14280

Plt ID: 033-00078

Reviewer: ERG/AB

Date: 05/03/01

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

3.5

30.7

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.12	0.12	0.01	1.53	0.08	1.29

*PM emission factors are for filterable and condensable PM combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only**

MM BTU/HR <100

Washer Line Stage 1 Burner (C.U. 002)

HAPs Emissions

Company Name: Rhinehart Finishing, L.L.C.

Address City IN Zip: Spencerville, IN 46788

CP: 033-14280

Plt ID: 033-00078

Reviewer: ERG/AB

Date: 05/03/01

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.219E-05	1.840E-05	1.150E-03	2.759E-02	5.212E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	7.665E-06	1.686E-05	2.146E-05	5.825E-06	3.219E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Washer Line Stage 4 Burner (C.U. 003)

Company Name: Rhinehart Finishing, L.L.C.

Address City IN Zip: Spencerville, IN 46788

CP: 033-14280

Plt ID: 033-00078

Reviewer: ERG/AB

Date: 05/03/01

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.0

17.5

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.07	0.07	0.01	0.88	0.05	0.74

*PM emission factors are for filterable and condensable PM combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only**

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MM BTU/HR <100

Washer Line Stage 4 Burner (C.U. 003)

HAPs Emissions

Company Name: Rhinehart Finishing, L.L.C.

Address City IN Zip: Spencerville, IN 46788

CP: 033-14280

Plt ID: 033-00078

Reviewer: ERG/AB

Date: 05/03/01

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.840E-05	1.051E-05	6.570E-04	1.577E-02	2.978E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	4.380E-06	9.636E-06	1.226E-05	3.329E-06	1.840E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Powder Coat Cure Oven (C.U. 004)

Company Name: Rhinehart Finishing, L.L.C.

Address City IN Zip: Spencerville, IN 46788

CP: 033-14280

Plt ID: 033-00078

Reviewer: ERG/AB

Date: 05/03/01

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

3.5

30.7

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.12	0.12	0.01	1.53	0.08	1.29

*PM emission factors are for filterable and condensable PM combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only**

Page 8 of 25 TSD App A

MM BTU/HR <100

Powder Coat Cure Oven (C.U. 004)

HAPs Emissions

Company Name: Rhinehart Finishing, L.L.C.

Address City IN Zip: Spencerville, IN 46788

CP: 033-14280

Plt ID: 033-00078

Reviewer: ERG/AB

Date: 05/03/01

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.219E-05	1.840E-05	1.150E-03	2.759E-02	5.212E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	7.665E-06	1.686E-05	2.146E-05	5.825E-06	3.219E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Liquid Spray Paint Cure Oven (C.U. 005)

Company Name: Rhinehart Finishing, L.L.C.

Address City IN Zip: Spencerville, IN 46788

CP: 033-14280

Plt ID: 033-00078

Reviewer: ERG/AB

Date: 05/03/01

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

1.5

13.1

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.05	0.05	0.00	0.66	0.04	0.55

*PM emission factors are for filterable and condensable PM combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only**

MM BTU/HR <100

Liquid Spray Paint Cure Oven (C.U. 005)

HAPs Emissions

Company Name: Rhinehart Finishing, L.L.C.

Address City IN Zip: Spencerville, IN 46788

CP: 033-14280

Plt ID: 033-00078

Reviewer: ERG/AB

Date: 05/03/01

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.380E-05	7.884E-06	4.928E-04	1.183E-02	2.234E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	3.285E-06	7.227E-06	9.198E-06	2.497E-06	1.380E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

North General Building Heaters (C.U. 006)

Company Name: Rhinehart Finishing, L.L.C.

Address City IN Zip: Spencerville, IN 46788c

CP: 033-14280

Plt ID: 033-00078

Reviewer: ERG/AB

Date: 05/03/01

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

0.3

2.6

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.01	0.01	0.00	0.13	0.01	0.11

*PM emission factors are for filterable and condensable PM combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only**

MM BTU/HR <100

North General Building Heaters (C.U. 006)

HAPs Emissions

Company Name: Rhinehart Finishing, L.L.C.

Address City IN Zip: Spencerville, IN 46788

CP: 033-14280

Plt ID: 033-00078

Reviewer: ERG/AB

Date: 05/03/01

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.759E-06	1.577E-06	9.855E-05	2.365E-03	4.468E-06

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	6.570E-07	1.445E-06	1.840E-06	4.993E-07	2.759E-06

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Southeast General Building Heater (C.U. 007)

Company Name: Rhinehart Finishing, L.L.C.

Address City IN Zip: Spencerville, IN 46788

CP: 033-14280

Plt ID: 033-00078

Reviewer: ERG/AB

Date: 05/03/01

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

0.3

2.6

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.01	0.01	0.00	0.13	0.01	0.11

*PM emission factors are for filterable and condensable PM combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****Southeast General Building Heater (C.U. 007)****HAPs Emissions****Company Name: Rhinehart Finishing, L.L.C.****Address City IN Zip: Spencerville, IN 46788****CP: 033-14280****Plt ID: 033-00078****Reviewer: ERG/AB****Date: 05/03/01****HAPs - Organics**

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.759E-06	1.577E-06	9.855E-05	2.365E-03	4.468E-06

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	6.570E-07	1.445E-06	1.840E-06	4.993E-07	2.759E-06

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Powder Paint Room Air Makeup Unit (C.U. 010)

Company Name: Rhinehart Finishing, L.L.C.

Address City IN Zip: Spencerville, IN 46788

CP: 033-14280

Plt ID: 033-00078

Reviewer: ERG/AB

Date: 05/03/01

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

1.1

9.6

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.04	0.04	0.00	0.48	0.03	0.40

*PM emission factors are for filterable and condensable PM combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only**

MM BTU/HR <100

Powder Paint Room Air Makeup Unit (C.U. 010)

HAPs Emissions

Company Name: Rhinehart Finishing, L.L.C.

Address City IN Zip: Spencerville, IN 46788

CP: 033-14280

Plt ID: 033-00078

Reviewer: ERG/AB

Date: 05/03/01

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.012E-05	5.782E-06	3.614E-04	8.672E-03	1.638E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.409E-06	5.300E-06	6.745E-06	1.831E-06	1.012E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Warehouse Area Air Makeup Unit (C.U. 011)

Company Name: Rhinehart Finishing, L.L.C.

Address City IN Zip: Spencerville, IN 46788

CP: 033-14280

Plt ID: 033-00078

Reviewer: ERG/AB

Date: 05/03/01

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.1

18.2

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.07	0.07	0.01	0.91	0.05	0.76

*PM emission factors are for filterable and condensable PM combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only**

MM BTU/HR <100

Warehouse Area Air Makeup Unit (C.U. 011)

HAPs Emissions

Company Name: Rhinehart Finishing, L.L.C.

Address City IN Zip: Spencerville, IN 46788

CP: 033-14280

Plt ID: 033-00078

Reviewer: ERG/AB

Date: 05/03/01

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.907E-05	1.090E-05	6.810E-04	1.634E-02	3.087E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	4.540E-06	9.988E-06	1.271E-05	3.450E-06	1.907E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Environmental Room Air Conditioner and Heater No.1 and No.2 (C.U. 012 and C.U. 013)

Company Name: Rhinehart Finishing, L.L.C.

Address City IN Zip: Spencerville, IN 46788

CP: 033-14280

Plt ID: 033-00078

Reviewer: ERG/AB

Date: 05/03/01

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

0.3

2.6

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.010	0.010	0.001	0.131	0.007	0.110

*PM emission factors are for filterable and condensable PM combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only**

MM BTU/HR <100

Environmental Room Air Conditioner and Heater No.1 and No.2 (C.U. 012 and C.U. 013)

HAPs Emissions

Company Name: Rhinehart Finishing, L.L.C.

Address City IN Zip: Spencerville, IN 46788

CP: 033-14280

Plt ID: 033-00078

Reviewer: ERG/AB

Date: 05/03/01

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.759E-06	1.577E-06	9.855E-05	2.365E-03	4.468E-06

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	6.570E-07	1.445E-06	1.840E-06	4.993E-07	2.759E-06

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
Incinerator for Paint Hooks**

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Company Name: Rhinehart Finishing, L.L.C.
Address City IN Zip: Spencerville, IN 46788
CP: 033-14280
Plt ID: 033-00078
Reviewer: ERG/AB
Date: 05/03/01

<p align="center">THROUGHPUT lbs/hr 10</p>
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THROUGHPUT
ton/yr
43.8

Emission Factor in lb/ton	POLLUTANT				
	PM	SO2	CO	VOC	NOX
	7.0	2.5	10.0	3.0	3.0
Potential Emissions in ton/yr	0.2	0.1	0.2	0.1	0.1

Methodology

Emission factors are from AP 42 (5th Edition 1/95) Table 2.1-12, Uncontrolled emission factors for industrial/commercial refuse combustors, multiple chambers

Throughput (lb/hr) * 8760 hr/yr * ton/2000 lb = throughput (ton/yr)

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no update necessary 11/98

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

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Company Name: Rhinehart Finishing, L.L.C.
Address City IN Zip: Spencerville, IN 46788
CP: 033-14280
Plt ID: 033-00078
Reviewer: ERG/AB
Date: 05/03/01

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Paint Booth 1:																
Primer	12.1	27.69%	0.0%	27.7%	0.0%	52.00%	0.00059	425.000	3.34	3.34	0.84	20.10	3.67	3.35	6.42	65%
Top Coat	11.9	29.46%	0.0%	29.5%	0.0%	50.20%	0.00088	425.000	3.50	3.50	1.31	31.41	5.73	4.80	6.97	65%
Paint Booth 2:																
Primer	12.1	27.69%	0.0%	27.7%	0.0%	52.00%	0.00059	425.000	3.34	3.34	0.84	20.10	3.67	3.35	6.42	65%
Top Coat	11.9	29.46%	0.0%	29.5%	0.0%	50.20%	0.00088	425.000	3.50	3.50	1.31	31.41	5.73	4.80	6.97	65%
Paint Booth 3:																
Primer	12.1	27.69%	0.0%	27.7%	0.0%	52.00%	0.00059	425.000	3.34	3.34	0.84	20.10	3.67	3.35	6.42	65%
Top Coat	11.3	30.95%	0.0%	31.0%	0.0%	49.84%	0.00088	425.000	3.50	3.50	1.31	31.42	5.73	4.48	7.02	65%
Paint Booth 4:																
Primer	12.1	27.69%	0.0%	27.7%	0.0%	52.00%	0.00059	425.000	3.34	3.34	0.84	20.10	3.67	3.35	6.42	65%
Top Coat	11.3	30.95%	0.0%	31.0%	0.0%	49.84%	0.00088	425.000	3.50	3.50	1.31	31.42	5.73	4.48	7.02	65%

Totals									27.36	27.36	8.59	206.06	37.61	31.97		
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State Potential Emissions

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

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Appendix A: Emission Calculations
HAP Emission Calculations
From Surface Coating Operations
Company Name: Rhinehart Finishing, L.L.C.
Address City IN Zip: Spencerville, IN 46788
CP#: 033-14280
Plt ID: 033-00078
Permit Reviewer: ERG/AB
Date: 05/03/01

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Material	Density (lb/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MEK	Weight % Chromium Compounds	Weight % Cobalt Compounds	Weight % HMDI	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MEK Emissions (ton/yr)	Chromium Compound Emissions (ton/yr)	Cobalt Compound Emissions (ton/yr)	HMDI Emissions (ton/yr)
Paint Booth 1															
Primer (E90H226)	13.26	0.000472	425.00	0.00%	4.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.47	0.00	0.00	0.00	0.00
Primer (E93V227)	7.36	0.000118	425.00	0.00%	20.00%	12.00%	0.00%	0.00%	0.00%	0.00	0.32	0.19	0.00	0.00	0.00
Top Coat (F93G27)	12.8	0.000472	425.00	1.00%	0.00%	0.00%	10.00%	7.00%	0.00%	0.11	0.00	0.00	1.12	0.79	0.00
Top Coat (V93V20)	8.84	0.000118	425.00	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00	0.00	0.00	0.00	0.00	0.02
Paint Booth 2															
Primer (E90H226)	13.26	0.000472	425.00	0.00%	4.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.47	0.00	0.00	0.00	0.00
Primer (E93V227)	7.36	0.000118	425.00	0.00%	20.00%	12.00%	0.00%	0.00%	0.00%	0.00	0.32	0.19	0.00	0.00	0.00
Top Coat (F93G27)	12.8	0.000472	425.00	1.00%	0.00%	0.00%	10.00%	7.00%	0.00%	0.11	0.00	0.00	1.12	0.79	0.00
Top Coat (V93V20)	8.84	0.000118	425.00	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00	0.00	0.00	0.00	0.00	0.02
Paint Booth 3															
Primer (E90H226)	13.26	0.000472	425.00	0.00%	4.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.47	0.00	0.00	0.00	0.00
Primer (E93V227)	7.36	0.000118	425.00	0.00%	20.00%	12.00%	0.00%	0.00%	0.00%	0.00	0.32	0.19	0.00	0.00	0.00
Top Coat (N2000A)	11.93	0.000472	425.00	2.00%	0.00%	10.00%	0.00%	0.00%	0.00%	0.21	0.00	1.05	0.00	0.00	0.00
Top Coat (N2000B)	11.3	0.000118	425.00	12.00%	0.00%	0.00%	0.00%	0.00%	1.60%	0.30	0.00	0.00	0.00	0.00	0.04
Paint Booth 4															
Primer (E90H226)	13.26	0.000472	425.00	0.00%	4.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.47	0.00	0.00	0.00	0.00
Primer (E93V227)	7.36	0.000118	425.00	0.00%	20.00%	12.00%	0.00%	0.00%	0.00%	0.00	0.32	0.19	0.00	0.00	0.00
Top Coat (N2000A)	11.93	0.000472	425.00	2.00%	0.00%	10.00%	0.00%	0.00%	0.00%	0.21	0.00	1.05	0.00	0.00	0.00
Top Coat (N2000B)	11.3	0.000118	425.00	12.00%	0.00%	0.00%	0.00%	0.00%	1.60%	0.30	0.00	0.00	0.00	0.00	0.04

Total State Potential Emissions

1.24 3.16 2.87 2.25 1.57 0.12

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs